



Work Experience for High School Students with Disabilities Act (Act 26)

**Office of Vocational Rehabilitation Quarterly Report
January 1, 2021 – March 31, 2021**

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Background & Purpose

On May 17, 2016, the General Assembly of the Commonwealth of Pennsylvania enacted the *Work Experience for High School Students with Disabilities Act*, Act 2016-26 (May 17, 2016), 43 P.S. § 683.1 *et seq.*, that maintains collaboration with local education and public agencies to ensure that students with disabilities are prepared to enter the workforce after graduation.

On June 24, 2017, the notice of the appropriation to carry out the provisions of this Act was published in the Pennsylvania Bulletin. Act 26 charges the Office of Vocational Rehabilitation (OVR), in collaboration with Pennsylvania's Department of Education (PDE), with collecting and reporting data related to students with disabilities who have transition plans and with facilitating the process of job and career development between local education agencies (LEAs) and public and private employers to ensure the successful transition of high school students with disabilities into competitive integrated employment.

As outlined in Act 26, and in collaboration with LEAs, OVR will:

- 1) provide information for the development of individual education plans for high school students with disabilities, ensuring that job skill training is included in the plans, when appropriate. When possible, OVR staff will attend individual education plan meetings in person or by alternative means, such as video conferences and conference calls, when invited by LEAs.
- 2) arrange for work-based learning experiences, which may include in-school or after-school opportunities or experiences outside the traditional school setting, including internships, at competitive wages in integrated settings with public or private sector employers.
- 3) provide professional guidance relative to job coaching services to eligible individuals when the services are included in an individualized plan for employment by OVR, so that high school students with disabilities may succeed in competitive employment with private sector and public employers.
- 4) provide counseling on enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education.

Also, as required by Section 3 (5) of Act 26, OVR will provide the following information on its publicly available website 45 days after the end of each calendar quarter by each county for the prior calendar quarter:

- (i) the number of Individualized Education Program (IEP) meetings attended by OVR staff,
- (ii) the number of IEPs that include new or significantly modified goals and specific steps toward the attainment of competitive integrated employment (data only available annually and not by county),
- (iii) the number of job referrals made to employers on behalf of students with disabilities while still in high school,
- (iv) the number of high school students with disabilities working in part-time or summer jobs as a result of referrals made by OVR staff,

- (v) the number of high school students with disabilities working in part-time or summer jobs who are receiving job coaching services and
- (vi) the number of high school students with disabilities who enter competitive integrated employment within three months of their graduation.

In addition to the required information, OVR will also include data regarding some of the additional services provided under Pre-Employment Transition Services (Pre-ETS) to demonstrate a more comprehensive review of OVR's Pre-ETS activities.

Public data from PDE indicates there are over 179,800 students with disabilities between the ages of 14 and 21 eligible for transition services in Pennsylvania. According to PDE's regulations regarding Special Education Services and Programs, 22 Pa. Code Chapter 14, the minimum age for transition planning is 14. Transition services are activities provided by schools and/or outside agencies which prepare a student with a disability to move from school to post-school activities, including further education and employment. Research has shown that gaining paid work experience while still in high school is a strong predictor of whether a student with a disability will be employed after high school.

OVR continues to provide pre-employment transition services during a period of state mandated mitigation strategies for slowing the spread of Coronavirus Disease - 2019 (COVID-19). OVR is committed to providing quality services to Pennsylvanians with disabilities. During this unprecedented time, the health and safety of our customers, staff, and community partners remain our top priority. Therefore, it should be noted that services have been impacted by the mitigation efforts, which did include a temporary suspension of community based Pre-ETS, like Paid Work Experiences, for 2 months in Spring 2020. Pre-ETS have moved to virtual platforms, and community-based services are available as of the publishing date of this report.

(i) IEP Meetings Attended by OVR Staff

The enactment of the Workforce Innovation and Opportunity Act (WIOA) in 2014 places significant emphasis on the provision of services to students and youth with disabilities. OVR estimates that there are over 179,800 students with IEPs between 14 and 21 (transition age in PA) that are eligible for Transition and Pre-ETS. OVR's data collection and case management system, the Commonwealth Workforce Development System (CWDS), captures the delivery of Pre-ETS activities and expenditures. Per Act 26, OVR is now required to report on IEP meeting attendance. However, under federal WIOA regulations, an IEP is not one of the 5 required Pre-ETS services and RSA DOES NOT require student data for IEP meetings.

As per PDE guidance, the Family Educational Rights and Privacy Act (FERPA) has specific regulations pertaining to the Education Record of a student in a Local Education Agency (LEA). The Bureau of Special Education (BSE) recommends that the LEA notify their district solicitor to receive appropriate guidance on FERPA regulations, including policies and practices for any student information collection by an outside agency. Due to LEAs

having various policies and procedures regarding the exchange of student information, securing signed releases for student-level data remains a challenge for OVR. In an effort for OVR to improve communication regarding this issue, PDE/BSE may assist OVR by utilizing the PENN*LINK system to notify LEAs of OVR's data needs and reporting requirements.

PENN*LINK is the official electronic mail service for PDE that manages the delivery of e-mail among the LEAs: school districts, charter schools, intermediate units, and vocational technical schools/career and technology centers. The PDE uses PENN*LINK to convey information rapidly and efficiently to LEAs. PENN*LINK provides many statewide distribution lists, making it easy for users to communicate with large or small targeted groups of LEAs across Pennsylvania.

In addition to using broad communication to the field, it is imperative that continued collaboration between OVR and LEAs occur prior to IEP meetings. OVR has established guidance to address the complexity of consent and data collection. The PDE/BSE has recommended that OVR discuss data needs and student release of information practices when arranging visits for IEP meetings. This will allow an LEA to review their data exchange policies in advance of OVR's attendance, therefore creating a more favorable outcome of having releases available at the time of the IEP meetings.

Due to staff and logistical limitations, it is not feasible for OVR staff to attend every IEP meeting; however, OVR will continue to attend as many IEP meetings as possible – with a focus on those IEP meetings held two years prior to a student's graduation or when specifically asked to attend due to a complex need. OVR is also working on a project with Cyber Schools to track and improve Cyber School IEP attendance.

OVR staff were able to attend 2,257 IEP meetings during the third quarter of the SFY 2020-2021, which reports data from 01/01/2021 to 03/31/2021. This is an 80% increase from the third quarter of the SFY 2019-2021 which reported OVR staff were able to attend 1,253 IEP meetings.

OVR regularly reviews Act 26 reports with district office management staff and provides technical assistance specific to their local needs. Each OVR counselor covers multiple schools over a wide geographical area, so advanced notice of IEP meetings is critical to assist with scheduling and attendance. The LEA should ensure written consent from a parent/guardian has been obtained so OVR can be invited to the IEP meeting (and for reporting purposes). To increase the number of IEP meetings in which OVR staff participate, LEAs will be encouraged to offer alternative communication opportunities, such as the use of video conferences and conference calls.

Table 1: Act 26 Reporting Item (i) - IEP Meetings Attended by OVR Staff
Data represents the number of meetings attended.

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Adams	10	1	9	12
Allegheny	140	43	123	252
Armstrong	15	4	30	25
Beaver	21	10	21	15
Bedford	2	7	15	25
Berks	88	50	70	116
Blair	32	36	83	114
Bradford	18	9	19	23
Bucks	19	7	33	35
Butler	23	19	68	62
Cambria	26	17	10	16
Cameron	N/A	3	N/A	2
Carbon	N/A	1	1	14
Centre	27	6	41	45
Chester	8	N/A	23	40
Clarion	11	16	19	35
Clearfield	5	3	10	20
Clinton	N/A	3	3	1
Columbia	1	N/A	4	N/A
Crawford	7	13	12	32
Cumberland	10	8	26	32
Dauphin	12	20	22	75
Delaware	8	4	9	19
Elk	4	7	14	9
Erie	17	20	20	75
Fayette	1	1	5	24
Forest	3	3	6	2
Franklin	5	10	7	11
Fulton	6	22	6	8
Greene	2	5	7	21
Huntingdon	9	17	23	25
Indiana	N/A	1	14	5
Jefferson	1	6	3	38
Juniata	N/A	N/A	N/A	N/A
Lackawanna	51	14	54	63
Lancaster	53	12	55	70
Lawrence	10	11	23	13

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Lebanon	3	3	3	1
Lehigh	18	5	17	33
Luzerne	47	11	68	91
Lycoming	2	18	47	23
McKean	2	19	2	29
Mercer	7	6	25	24
Mifflin	N/A	1	4	5
Monroe	14	1	17	34
Montgomery	18	6	17	50
Montour	2	1	6	N/A
Northampton	32	5	24	80
Northumberland	9	1	4	17
Perry	3	3	4	9
Philadelphia	133	16	72	44
Pike	2	N/A	8	7
Potter	N/A	N/A	N/A	2
Schuylkill	23	29	41	61
Snyder	1	2	8	4
Somerset	N/A	N/A	3	3
Sullivan	11	N/A	1	12
Susquehanna	1	2	15	8
Tioga	4	18	28	18
Union	4	4	18	7
Venango	33	1	28	86
Warren	6	3	2	16
Washington	40	49	78	102
Wayne	N/A	3	5	6
Westmoreland	23	2	13	16
Wyoming	19	5	4	19
York	52	23	42	76
Total Number of Meetings Attended	1,154	647	1,492	2,257

(ii) IEPs that Include New or Significantly Modified Goals and Specific Steps toward the Attainment of Competitive Integrated Employment

Summary Language

A Memorandum of Understanding (MOU) between the Commonwealth of Pennsylvania's Department of Education (PDE) and Department of Labor and Industry (L&I) has been developed to allow these partner agencies to collect and share student level data so that L&I may fulfill its statutory duties as outlined in Act 26. This MOU between L&I and PDE complies with all federal and state laws and regulations pertaining to data maintenance, disclosure and security.

The Transition/Work Experience Data Collection

LEAs collect data based on the data items pertaining to work experience for students with disabilities involved in transition planning as part of their IEP. This includes IEPs that were developed from the beginning of the 2019-2020 school year. The relevant work experience/transition data elements are to be reported on the July 1, 2020, Pennsylvania Information Management System (PIMS) Special Education Snapshot for students 14 years of age or any student who has a transition plan as part of his/her IEP.

Transition planning is a team discussion, and the data presented and collected as part of the transition planning process may benefit the student in achieving their post-school outcomes. LEAs should develop and utilize a recording method for the responses to the following data questions that will assist LEA staff members in retrieving and completing the required data fields during the annual PIMS submissions. While these five questions need to be addressed from information/data contained in the IEP, it is not the intention of Act 26 to add these questions into the IEP document.

The following data must be collected by IEP teams:

- Does this student have a transition plan as part of their IEP? (YES/NO)

According to 22 PA Code § 14.131. IEP. (a): In addition to the requirements incorporated by reference (see 34 CFR 300.320—300.324), the IEP of each student with a disability must include: (5) For students who are 14 years of age or older, a transition plan that includes appropriate measurable postsecondary goals related to training, education, employment and, when appropriate, independent living skills. (If yes, then all the following questions are required to be answered.)

NOTE: Based on each individual student IEP, there may be a "no" response to a question below.

- Does the IEP contain new services that support paid work-based learning experiences in a competitive (at least minimum wage) integrated setting? (YES/NO)
- Does the IEP contain services that include job supports/coaching? (YES/NO)

- Does the IEP contain services that include career development and job exploration? (YES/NO)
- Has the transition IEP been modified to include services that support paid work-based learning experiences in a competitive (at least minimum wage) integrated setting? (YES/NO)

Annually in November, PDE/BSE must submit special education data to the United States Department of Education (USDE) and the Office of Special Education Programs (OSEP). The federal reporting does not include the data collected for this report. The PDE/BSE collects the data for these transition questions to assist OVR in accessing information.

Table 2: Act 26 Reporting Item (ii) – IEPs that Include New or Significantly Modified Goals and Specific Steps Toward the Attainment of Competitive Integrated Employment *

Data represents students served from 7/1/2019 - 6/30/2020 as reported by PDE.

County	IEPs - Transition Status	IEPs - Paid Work-Based Learning	IEPs - Transition Job Supports/ Coaching	IEPs - Transition Career Dev/Job Exploration	IEPs - Transition Modified Paid Work-Based Learning
Adams	870	30	61	834	18
Allegheny	17,104	3,794	3,665	14,584	1,305
Armstrong	785	483	153	782	124
Beaver	4,245	286	449	3,759	132
Bedford	542	17	37	515	4
Berks	6,796	154	484	6,077	137
Blair	1,460	162	134	1,374	32
Bradford	850	212	270	826	218
Bucks	7,218	971	705	5,671	272
Butler	1,945	64	214	1,844	37
Cambria	1,338	251	166	1,285	88
Cameron	65	4	8	48	4
Carbon	580	15	86	355	17
Centre	882	106	126	663	12
Chester	7,749	472	849	6,241	292
Clarion	393	71	14	325	4
Clearfield	1,100	112	78	1,040	28
Clinton	473	8	18	112	1
Columbia	636	95	123	480	34
Crawford	738	228	247	693	114
Cumberland	2,301	450	304	1,963	122

County	IEPs - Transition Status	IEPs - Paid Work-Based Learning	IEPs - Transition Job Supports/ Coaching	IEPs - Transition Career Dev/Job Exploration	IEPs - Transition Modified Paid Work-Based Learning
Dauphin	5,943	1,521	1,698	4,526	1,442
Delaware	6,590	622	829	5,355	430
Elk	300	2	10	296	3
Erie	3,601	160	616	3,368	119
Fayette	1,610	28	48	1,460	28
Forest	53	1	0	30	2
Franklin	1,271	210	263	1,032	166
Fulton	118	20	28	111	20
Greene	423	30	35	374	7
Huntingdon	516	40	121	404	1
Indiana	760	49	126	709	26
Jefferson	396	16	32	364	2
Juniata	43	3	15	43	4
Lackawanna	2,530	240	383	2,182	71
Lancaster	5,354	802	1,991	4,761	780
Lawrence	788	312	333	742	22
Lebanon	1,845	137	295	1,719	67
Lehigh	4,659	103	360	4,107	111
Luzerne	3,987	412	760	3,428	207
Lycoming	1,076	323	371	930	322
McKean	475	19	50	457	19
Mercer	1,222	111	197	1,097	61
Mifflin	334	3	5	114	2
Monroe	2,514	164	181	1,796	116
Montgomery	10,640	588	1,135	8,562	328
Montour	208	42	54	206	4
Northampton	3,831	625	411	3,037	245
Northumberland	988	19	173	840	21
Perry	518	89	58	504	8
Philadelphia	41,067	655	1,659	40,381	36,268
Pike	729	49	103	594	33
Potter	198	37	62	174	23
Schuylkill	1,662	175	305	1,537	123
Snyder	362	8	55	305	19
Somerset	670	79	105	653	25
Sullivan	45	3	5	45	3
Susquehanna	540	14	56	486	3
Tioga	480	50	110	458	48
Union	292	1	17	282	1

County	IEPs - Transition Status	IEPs - Paid Work-Based Learning	IEPs - Transition Job Supports/ Coaching	IEPs - Transition Career Dev/Job Exploration	IEPs - Transition Modified Paid Work-Based Learning
Venango	739	16	22	438	9
Warren	438	30	30	418	13
Washington	2,246	321	343	2,083	119
Wayne	409	30	113	346	9
Westmoreland	3,404	99	232	3,094	72
Wyoming	273	5	11	251	15
York	5,607	776	663	4,745	239
Totals	179,824	17,024	22,660	158,315	44,651

(iii) Job Referrals Made to Employers on behalf of Students with Disabilities while Still in High School

Act 26 Reporting Item (iii) includes job referrals made to employers on behalf of students with disabilities while still in high school that were completed by both OVR staff initiated activities and those purchased under Work-Based Learning Experience job development initiatives and projects. OVR's Business Services staff have developed local business connections on behalf of students with disabilities, and OVR staff collaborate regionally to engage federal and state workforce agencies, county programs and community rehabilitation providers to expand job referrals made to employers.

During the third quarter of the SFY 2020-2021, which reports data from 01/01/2021 to 03/31/2021, 833 job referrals were made to employers on behalf of students with disabilities while still in high school.

Table 3: Act 26 Reporting Item (iii) - Job Referrals Made to Employers on Behalf of Students with Disabilities while Still in High School
*Data represents the number of unique students served. **

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Adams	1	5	1	7
Allegheny	129	79	76	128
Armstrong	2	N/A	1	2
Beaver	4	9	4	8
Bedford	3	4	3	6
Berks	55	44	55	62
Blair	2	2	6	8

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Bradford	4	5	6	5
Bucks	13	24	38	45
Butler	2	5	3	3
Cambria	11	5	8	10
Cameron	N/A	N/A	2	1
Carbon	3	2	3	1
Centre	1	1	3	6
Chester	7	6	11	20
Clarion	5	5	8	9
Clearfield	18	21	19	21
Clinton	1	N/A	2	1
Columbia	1	1	N/A	2
Crawford	1	2	3	4
Cumberland	6	5	7	5
Dauphin	2	6	4	22
Delaware	6	2	5	8
Elk	N/A	2	3	7
Erie	4	10	13	9
Fayette	1	6	2	8
Forest	3	N/A	3	2
Franklin	5	5	4	2
Fulton	N/A	N/A	N/A	N/A
Greene	2	1	2	6
Huntingdon	1	2	2	1
Indiana	10	3	3	5
Jefferson	1	N/A	4	5
Juniata	N/A	N/A	N/A	2
Lackawanna	12	15	15	18
Lancaster	20	22	22	28
Lawrence	4	2	10	N/A
Lebanon	1	4	6	3
Lehigh	11	1	16	17
Luzerne	29	48	45	56
Lycoming	2	2	3	7
McKean	8	4	9	7
Mercer	N/A	2	21	3
Mifflin	3	N/A	N/A	N/A
Monroe	17	21	27	23
Montgomery	27	35	35	42
Montour	1	1	N/A	N/A

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Northampton	9	4	19	14
Northumberland	N/A	3	N/A	2
Perry	1	3	1	2
Philadelphia	20	26	6	23
Pike	6	6	9	6
Potter	1	1	N/A	N/A
Schuylkill	6	15	2	3
Snyder	1	N/A	N/A	N/A
Somerset	5	N/A	2	5
Sullivan	N/A	N/A	N/A	N/A
Susquehanna	4	2	2	2
Tioga	40	8	13	8
Union	N/A	1	2	1
Venango	3	5	5	6
Warren	N/A	N/A	N/A	N/A
Washington	16	17	31	49
Wayne	3	6	5	8
Westmoreland	18	4	4	28
Wyoming	N/A	1	1	2
York	16	21	17	39
Total Number of Unique Students	588	542	632	833

** Please Note: A single student could have received multiple job referrals, and, if so, the referrals could have occurred in different quarters. Therefore, the total number of students who received referrals during the year may not equal the total of the numbers who received them each quarter.*

(iv) High School Students with Disabilities Working in Part-Time or Summer Jobs as a result of Referrals Made by OVR Staff

Act 26 reporting item (iv) demonstrates the success of targeted job referrals made by OVR staff to employers on behalf of students with disabilities that resulted in the student working in part-time or summer jobs. Engaging business and industry is a critical component to our ability to refer and place high school students with disabilities in part-time and summer jobs.

During the third quarter of the SFY 2020-2021, which reports data from 01/01/2021 to 03/31/2021, there were 449 high school students with disabilities working in part-time or summer jobs because of referrals made by OVR staff.

Table 4: Act 26 Reporting Item (iv) - High School Students with Disabilities Working in Part-Time or Summer Jobs as a Result of Referrals Made by OVR Staff

*Data represents the number of unique students served. **

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Adams	6	N/A	2	N/A
Allegheny	278	56	29	31
Armstrong	1	N/A	N/A	1
Beaver	2	N/A	1	9
Bedford	4	1	1	4
Berks	24	4	13	23
Blair	8	N/A	3	7
Bradford	7	5	7	10
Bucks	18	N/A	12	19
Butler	6	1	5	6
Cambria	32	2	7	15
Cameron	1	N/A	1	2
Carbon	3	1	5	3
Centre	3	1	N/A	2
Chester	6	1	4	11
Clarion	2	4	1	3
Clearfield	1	6	3	9
Clinton	1	N/A	4	2
Columbia	2	1	2	6
Crawford	N/A	2	2	1
Cumberland	10	5	7	7
Dauphin	13	3	8	8
Delaware	12	5	11	16
Elk	N/A	2	N/A	3
Erie	14	3	8	3
Fayette	2	N/A	1	2
Forest	11	1	14	8
Franklin	9	N/A	3	2
Fulton	N/A	N/A	N/A	N/A
Greene	1	1	2	1
Huntingdon	1	1	1	2
Indiana	16	1	N/A	5
Jefferson	1	N/A	1	3
Juniata	N/A	N/A	N/A	N/A
Lackawanna	17	2	8	9

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Lancaster	31	9	6	17
Lawrence	11	1	N/A	N/A
Lebanon	4	3	2	3
Lehigh	28	N/A	9	8
Luzerne	30	14	15	26
Lycoming	21	6	15	17
McKean	11	2	7	6
Mercer	N/A	1	1	3
Mifflin	N/A	N/A	1	N/A
Monroe	30	11	22	10
Montgomery	56	9	29	33
Montour	2	1	N/A	1
Northampton	25	2	13	15
Northumberland	3	3	3	3
Perry	2	1	1	2
Philadelphia	15	N/A	3	1
Pike	21	5	4	2
Potter	2	N/A	N/A	N/A
Schuylkill	5	7	5	7
Snyder	2	N/A	N/A	1
Somerset	7	N/A	1	2
Sullivan	1	N/A	N/A	1
Susquehanna	2	2	1	1
Tioga	3	3	6	4
Union	4	2	1	1
Venango	4	5	7	5
Warren	A	N/A	N/A	N/A
Washington	22	8	19	21
Wayne	6	4	3	1
Westmoreland	31	N/A	14	9
Wyoming	A	N/A	N/A	1
York	25	2	8	15
Total Number of Unique Students	916	210	362	449

** Please Note: A single student may have worked in multiple part-time and/or summer jobs as a result of referrals made by OVR Staff, and jobs could have taken place in different quarters or spanned multiple quarters. Therefore, the total number of students with part-time or summer jobs as a result of OVR referrals for the year may not equal the total of the numbers who had them each quarter.*

(v) High School Students with Disabilities Working in Part-Time or Summer Jobs who are Receiving Job Coaching Services

The number of high school students with disabilities working in part-time or summer jobs who are receiving traditional job coaching services is limited and may be reflective of the fact that job coaching/supported employment is not currently an allowable Pre-Employment Transition Service (Pre-ETS) under the Workforce Innovation and Opportunity Act (WIOA). Also, not all students with disabilities working in part-time or summer jobs require traditional job coaching services. Typically, job coaching occurs on site at the place of employment with direct service to the customer at 100% of the time that the customer is on the job initially and begins to fade as the customer learns job tasks, develops natural supports and meets the expectations of the employer. Natural supports are particularly effective because they enhance the communication and social integration between the student with a disability and his/her co-workers and supervisor. However, students who participate in a Paid Work Experience (PWE) funded by OVR have the option to have a Worksite Trainer on site during their experience, should it be necessary. A Worksite Trainer can monitor the student's activities, interface with the employer and generally help to ensure a successful experience for the student and the employer during the PWE.

As indicated in Table 5 below and explained in the above paragraph, there was a total of 194 high school students with disabilities working in part-time or summer jobs who were receiving job coaching services in SFY 2020-2021 Q3.

Table 5: Act 26 Reporting Item (v) - High School Students with Disabilities Working in Part-Time or Summer Jobs who are Receiving Job Coaching Services
Data represents the number of unique students served. *

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Adams	1	1	1	N/A
Allegheny	13	18	18	17
Armstrong	N/A	N/A	N/A	N/A
Beaver	2	4	N/A	6
Bedford	1	N/A	2	N/A
Berks	5	10	3	10
Blair	3	1	3	3
Bradford	N/A	2	6	5
Bucks	7	7	6	8
Butler	1	2	4	1
Cambria	5	1	6	6
Cameron	N/A	N/A	N/A	1
Carbon	3	5	7	2
Centre	4	4	N/A	1

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Chester	4	4	1	4
Clarion	N/A	2	1	6
Clearfield	3	2	1	5
Clinton	N/A	N/A	1	N/A
Columbia	1	2	1	N/A
Crawford	2	1	2	N/A
Cumberland	2	3	3	3
Dauphin	N/A	3	5	6
Delaware	4	12	6	1
Elk	N/A	1	1	2
Erie	4	3	2	1
Fayette	N/A	1	1	1
Forest	N/A	1	1	7
Franklin	N/A	N/A	2	2
Fulton	N/A	N/A	N/A	N/A
Greene	N/A	N/A	N/A	N/A
Huntingdon	N/A	1	N/A	1
Indiana	N/A	2	N/A	1
Jefferson	N/A	N/A	1	2
Juniata	N/A	N/A	N/A	N/A
Lackawanna	7	5	7	3
Lancaster	4	4	12	4
Lawrence	1	N/A	1	N/A
Lebanon	N/A	N/A	2	2
Lehigh	4	2	10	2
Luzerne	8	14	21	11
Lycoming	2	1	2	2
McKean	1	2	7	4
Mercer	3	1	N/A	2
Mifflin	1	N/A	N/A	N/A
Monroe	12	14	21	5
Montgomery	5	9	11	15
Montour	1	2	N/A	N/A
Northampton	9	6	13	8
Northumberland	1	2	N/A	N/A
Perry	N/A	N/A	2	2
Philadelphia	11	9	5	2
Pike	4	4	3	N/A
Potter	N/A	N/A	N/A	N/A
Schuylkill	3	9	4	4

County	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Snyder	N/A	N/A	N/A	N/A
Somerset	4	4	2	2
Sullivan	N/A	N/A	1	1
Susquehanna	N/A	2	1	1
Tioga	N/A	5	3	N/A
Union	1	3	N/A	1
Venango	N/A	2	2	2
Warren	N/A	1	N/A	N/A
Washington	1	3	8	7
Wayne	2	2	3	1
Westmoreland	3	5	N/A	2
Wyoming	N/A	N/A	N/A	1
York	5	6	6	8
Total Number of Unique Students	158	210	232	194

** Please Note: A single student could have received job coaching for multiple part-time and/or summer jobs, and jobs could have taken place in different quarters or spanned multiple quarters. Therefore, the total number of students with part-time or summer jobs who received job coaching services for the year may not equal the total of the numbers who had them each quarter.*

It should be noted that no Pre-ETS funds can be used to provide job coaching services to students with disabilities, as it is not an allowable Pre-ETS, and these supports are provided with VR funds.

Table 6: People with Disabilities Working in Part-Time or Summer Jobs Who are Receiving Job Coaching Services and Had Been Students While OVR Customers

SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
604	111	183	200

(vi) High School Students with Disabilities Who Enter Competitive Integrated Employment within Three Months of Their Graduation

The number of high school students with disabilities working within three months of graduation is imperfect due to several factors. First, OVR may only take a successful

placement (Status 26 Closure) after 90 days of employment in a competitive integrated employment setting. As a result, many students who become employed over the summer would not be able to be closed until their employment is stable and the 90-day period has passed, according to federal guidelines. OVR is also not often informed or aware of an employment outcome initially, causing delays in data entry which can impact the timeliness of outcome reporting. Additionally, OVR may provide Pre-Employment Transition Services (Pre-ETS) to potentially eligible students but does not have formal cases open to track outcomes of those activities. Federal guidelines only require that we track the services and expenditure of funds for potentially eligible students. Thus, students who participate in Pre-ETS activities who are potentially eligible may go to work, but OVR is unable to track that information to take credit for it. Finally, the students who do open cases often require multiple services to become successfully employed and those services, which can include supported employment, post-secondary training and/or other services, can take several years to complete. OVR remains committed to serving students with disabilities and ensuring that the services necessary for them to become competitively employed are available.

OVR can report there was a total of 357 participants who were previously coded as a "Student with a Disability" that entered competitive integrated employment within three months of their graduation for SFY 2020-2021 Q3. This is an increase from Q3 in 2019-2020 in which 11 participants were reported as entering competitive integrated employment within three months of their graduation.

Table 7: Act 26 Reporting Item (vi) - High School Students with Disabilities Who Entered Competitive Integrated Employment within Three Months of their Graduation

Data represents the number of students employed.

SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
10	272	400	357

As noted above, it is common for OVR participants, including students with disabilities, to remain in the program for extended periods while finishing post-secondary education or training to achieve a competitive integrated employment outcome, otherwise known as a successful 26 Closure. For this reporting period, item (vi) is not applicable because most high school students still have active cases; the measure only includes employment outcomes and doesn't consider students who have entered post-secondary education. Additionally, there is at least a 3-month lag between employment and successful closure.

Table 8: People with Disabilities Who Entered Competitive Integrated Employment and Had Been Students While OVR Customers

SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
202	107	238	209

Pre-Employment Transition Services

The Workforce Innovation and Opportunity Act (WIOA) places significant emphasis on the provision of services to students and youth with disabilities. Pursuant to the Rehabilitation Act of 1973, as amended in Title IV of WIOA, OVR is required to set aside at least 15% of its federal funds to provide Pre-Employment Transition Services (Pre-ETS) statewide to all students with disabilities who are eligible or potentially eligible for VR services. Funds reserved and made available may be used for the required, authorized and coordination activities of Pre-ETS. Act 26 requires OVR to report on IEP meeting attendance. Whereas, in the WIOA regulations, the IEP is not one of the 5 required Pre-ETS services, and RSA does not require student data for IEP meetings. The chart below demonstrates a more comprehensive review of OVR’s increased focus on Pre-ETS activities (as required by WIOA).

During the third quarter of the SFY 2020-2021, which reports data from 01/01/2021 to 03/31/2021, a total of 4,095 students with disabilities received Pre-ETS-related services.

OVR continues to develop, revise and implement policies and procedures to address changes related to Pre-ETS requirements, including the provision of services to students with disabilities who are potentially eligible for VR services. Other changes include clarifying specifications and data elements, as well as aligning forms to OVR guidance and policy.

Table 9: Pre-ETS Related Services

Data represents the number of unique students served.*

Pre-ETS Related Services	SFY 19-20 Q4	SFY 20-21 Q1	SFY 20-21 Q2	SFY 20-21 Q3
Counseling on Postsecondary Training Opportunities	1,381	513	689	884
Instruction in Self-Advocacy	785	566	1,145	950
Job Exploration Counseling	1,448	711	1,109	1,245
Work Based Learning	128	326	417	500
Workplace Readiness Training	1,522	809	1,634	2,013
Total Number of Unique Students Receiving Services	3,970	2,061	3,660	4,095

** Please Note: A single student could have received multiple services, and, if so, the services could have been received in different quarters or spanned multiple quarters. Therefore, the total number of students who received services during a quarter might not equal the total of the number of students who received each of the services that quarter. Also, the number of students receiving services during the year may not equal the total of the numbers who received them each quarter.*

Pre-Employment Transition Services (Pre-ETS) provide students with disabilities a generalized early start to career exploration and assists in identifying career interests that may be further explored through individualized Vocational Rehabilitation Services. Pre-ETS are provided through a continuum of service options by VR staff and community rehabilitation providers in collaboration with state and local education agencies to students with disabilities who need those services and are eligible or potentially eligible for VR services, as an earlier start to job exploration. OVR provides Pre-ETS to students with disabilities in Pennsylvania, ages 14-21 (in accordance with Commonwealth transition laws). Pre-ETS help students with disabilities learn about themselves, practice work skills, explore training options, and choose jobs. These services are offered to students with disabilities who are potentially eligible or already determined eligible for individualized VR services through an assigned Vocational Counselor. Pre-ETS are meant to supplement, not replace, Transition Services a student may be receiving through a school or service provider. The 5 required Pre-ETS include:

Self-Advocacy Instruction that teaches students with disabilities how to solve problems and manage their life.

Workplace Readiness Training that teaches students with disabilities how to get and keep a job.

Job Exploration Counseling that helps students with disabilities learn about jobs and pick a career.

Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education that

helps students with disabilities decide if college or training after high school is right for them.

Work-based Learning that connects what students with disabilities learn in school to real jobs.

Appendix

Workforce Innovation and Opportunity Act (WIOA)

The Office of Vocational Rehabilitation (OVR) is responsible for promoting the employment of individuals with disabilities by providing vocational rehabilitation, job training and placement services pursuant to the Rehabilitation Act of 1973, *as amended*, in Title IV of the WIOA of 2014. WIOA places significant emphasis on the provision of services to students and youth with disabilities who are eligible or potentially eligible for VR services. A student with a disability is an individual with a disability in a secondary, postsecondary or other recognized education program who:

- is not younger than the earliest age for the provision of transition services under section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)(1)(A)(i)(VIII)), unless the state elects a lower minimum age for receipt of pre-employment services and is not younger than that minimum age; and
- is not older than 21, unless the individual state law provides for a higher maximum age for receipt of services under the Individuals with Disabilities Education Act (20 U.S.C. 1400 *et seq.*) and is not older than that maximum age; and
- is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1411 *et seq.*); or
- is an individual with a disability, for purposes of section 504.

Postsecondary education and other recognized education programs must lead to a credential. According to 24 Pa. Code Chapter 14, the minimum age for transition planning is 14 years of age.

Eligibility Requirements for Vocational Rehabilitation services are based upon Federal Regulation 34 CFR § 361.42.

- 1) The individual has a physical or mental impairment.
- 2) The impairment(s) results in a substantial impediment to employment.
- 3) The individual requires vocational rehabilitation services to prepare for, secure, retain, *advance in* or regain employment that is consistent with the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interest and informed choice.
- 4) The individual intends to achieve an employment outcome that is consistent with their unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice.

Services to Potentially Eligible Students

In 2014, WIOA introduced the term Potentially Eligible and defined when and what Pre-Employment Transition Services (Pre-ETS) were able to be provided to students who were designated as Potentially Eligible. Potentially Eligible essentially means anyone who meets the definition of a student with a disability. Since Potentially Eligible students do not have an open case with OVR and have not been determined eligible, the types of

services and funding available is limited to Pre-ETS and Pre-ETS funding only. Although much less documentation is required with respect to Potentially Eligible students with disabilities who are receiving Pre-ETS, some basic documentation is necessary to ensure that: (1) these students indeed have a disability and, thus, are potentially eligible for VR services; and (2) OVR has sufficient information necessary to complete the mandatory federal RSA-911 Case Service Report and satisfy performance accountability requirements under section 116 of WIOA. To that end, the data elements required for a student with a disability who is receiving Pre-ETS and has not applied for or been determined eligible for VR services include: a unique identifier, social security number (if available), date of birth, race, ethnicity, student's disability, start date of Pre-ETS and the Pre-ETS provided, including the type of provider and amount expended for the service. According to the combined requirements in 34 CFR 361.47 and 34 CFR 361.56, VR agencies must maintain verifying documentation in their case management system for federal reporting purposes.

In accordance with section 113 of the Rehabilitation Act of 1973 (Public Law 93-112, 29 U.S.C. § 701 *et seq.*), OVR is required to set aside at least 15% of its federal funds to provide Pre-ETS statewide to students with disabilities who are eligible or potentially eligible for VR services. Funds reserved and made available may be used for the required, authorized and coordination activities of Pre-ETS.

Required Pre-ETS Activities

As outlined in federal regulations, OVR must provide the five "required" activities of Pre-ETS:

- 1) job exploration counseling;
- 2) work-based learning, which may include in-school, after school or community-based opportunities;
- 3) counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
- 4) workplace readiness training to develop social skills and independent living; and
- 5) instruction in self-advocacy, which may include peer mentoring.

Coordination Pre-ETS Activities

Pre-employment transition coordination activities are very closely aligned with the coordination and provision of the actual "required" activities. Coordination activities may be provided and consist of:

- a. attending Individualized Education Program (IEP) meetings for students with disabilities, when invited;
- b. working with local workforce development boards, One-Stop Centers and employers to develop work opportunities for students with disabilities;
- c. working with schools to coordinate and guarantee the provision of Pre-ETS; and
- d. attending person-centered planning meetings for individuals receiving services under Title 19 of the Social Security Act, when invited.

Authorized Pre-ETS Activities

The nine authorized activities focus on implementing effective strategies, disseminating information and providing instruction/training to VR staff, school transition personnel and other persons to improve the transition of students with disabilities from school to postsecondary education or employment. The authorized activities are those Pre-ETS that may be provided after a state has determined that Pre-ETS funds remain after provision of the required and coordination activities.